

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER DUNSTON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SIGNAL HILL TELECOM SERVICES US,
INC.,

Defendant.

No. 2:19-CV-00877-BJR

**STIPULATED MOTION AND
ORDER EXTENDING
DEADLINES**

Plaintiff Christopher Dunston (“Plaintiff” or “Dunston”) and Defendant Signal Hill Telecom Services US, Inc. (“Defendant” or “Signal Hill”), by and through their respective counsel, stipulate and jointly move the Court to continue the case schedule as set forth below.

WHEREAS, Plaintiff filed this lawsuit on June 6, 2019;

WHEREAS, Defendant answered the complaint on September 23, 2019;

WHEREAS, the parties have expressed interest in exploring confidential settlement before key case deadlines expire and have started that process;

WHEREAS, the parties and their counsel have been impacted by the COVID-19 pandemic, including but not limited to office closures, stay-at-home restrictions, and other unanticipated impacts;

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WHEREAS, the parties have discussed the need for the following extension and believe that good cause exists for the proposed extension;

WHEREAS, the parties agree that all current case schedule deadlines should be vacated and substituted for the proposed deadlines set forth below.

THEREFORE, the parties agree and stipulate as follows:

I. STIPULATED MOTION

The parties agree that good cause exists to continue the remaining deadlines that have not passed set forth in the Minute Order Setting Trial and Pretrial Dates, issued on October 21, 2019 (Dkt. No. 18), as follows:

Event	Prior Deadline	New Deadline (PROPOSED)
JURY TRIAL DATE (5 days)	January 11, 2021 at 9:30 AM	April 12, 2021 at 9:30 AM
Reports from expert witnesses under FRCP 26(a)(2) due	June 15, 2020	September 15, 2020
Discovery completed by	July 15, 2020	October 15, 2020
All dispositive motions must be filed by	August 14, 2020	November 16, 2020
All motions in limine must be filed by	December 7, 2020	March 8, 2021
Joint Pretrial Statement	December 14, 2020	March 15, 2021
Pretrial conference	December 28, 2020 at 11:00am	March 29, 2021 at 11:00 AM

1 STIPULATED TO AND DATED this 15th day of April, 2020.

2 SCHROETER GOLDMARK & BENDER

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/s/ Sheehan Sullivan

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II. ORDER

THIS MATTER comes before the Court on the Parties' Stipulated Motion Extending Deadlines. The Court having considered the Motion and other papers and pleadings on file, it is HEREBY ORDERED that good cause exists to modify the case schedule and the following extensions to the remaining trial and pretrial dates in this matter are revised as set forth below:

Event	Prior Deadline	New Deadline
JURY TRIAL DATE (5 days)	January 11, 2021 at 9:30 AM	April 12, 2021 at 9:30 AM
Reports from expert witnesses under FRCP 26(a)(2) due	June 15, 2020	September 15, 2020
Discovery completed by	July 15, 2020	October 15, 2020
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Joint Pretrial Statement	December 14, 2020	March 15, 2021
Pretrial conference	December 28, 2020 at 11:00am	March 29, 2021 at 11:00 AM

DATED this 16th day of April, 2020.



BARBARA J. ROTHSTEIN
United States District Court Judge